Lakes, Summary of Public Input

Lakes Timber Supply Area, Summary of Public Input

Lakes Timber Supply Area

Timber Supply Review

Summary of Public Input

B.C. Ministry of Forests
Lakes Forest District
185 Yellowhead Highway
P.O. Box 269
Burns Lake, B.C.
V0J 1E0

This is a summary of the public input that has been received on the Timber Supply Review in the Lakes Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Lakes Timber Supply Area
Summary of Public Input

106-05166/

B.C. Ministry of Forests

Lakes, Summary of Public Input

- Lakes Timber Supply Area, Summary of Public Input
- Background
- Public Review Process and Response
- Public Input
  - Timber Supply Analysis
    - Technical critique
    - Other Public Input
  - Socio-Economic Analysis
  - Discussion Paper
- Related issues and processes
- Appendix 1
  - Submissions received by the Lakes Forest District

Lakes, Summary of Public Input

◄ TOC ►

Background

As part of the review of timber supply in the Lakes Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and two technical reports—the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Lakes Timber Supply Area.

The first section of this summary, Public Review Process and Response, outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section, Public Input, summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Lakes Forest District office in Burns Lake.

◄ ▲ TOC ►

Lakes, Summary of Public Input

◄ TOC ►

Public Review Process and Response

Lakes Forest District staff actively solicited public input on the Timber Supply Review in the Lakes Timber Supply Area through the following actions:

- mailout of the three documents to about 90 individuals and organizations. The *Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager
- advertisements in *Lakes District News* and on CFLD Radio
- articles in the local newspaper, *Lakes District News*
- five meetings and open houses (see Table 1).

As Table 1 shows, over 50 individuals attended the open houses and information sessions. The Lakes Forest District office received five written submissions (see Appendix 1). In addition, a report titled *Response to MoF Lakes TSA Timber Supply Analysis and Discussion Paper* was submitted by the Lakes TSA Licensee Interest Group. This report is referred to as the "technical critique" in this summary.

Activity (No. of participants)	Date
Meetings	
First Nations (5) Skin Tyee Band Burns Lake Band (Carrier-Sekani) Broman Lake Band (Carrier-Sekani)	August 1, 1995
Forest Industry Babine Forest Products Co., West Fraser Mills Ltd., and Decker Lake Forest Products (4)	August 2, 1995
Northwood Pulp and Timber (5)	August 14, 1995
Open Houses	
Burns Lake (20)	August 1, 1995
Grassy Plains (20)	August 2, 1995

- **Table 1 Participation in public information sessions**

◄ ▲ TOC ►

Lakes, Summary of Public Input

◄ TOC ►

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Lakes Timber Supply Area is summarized under the following headings:

- Timber Supply Analysis
- Socio-Economic Analysis
- Discussion Paper

Public input on other ongoing government processes or other issues that may influence the timber supply in the Lakes Timber Supply Area in the future is summarized at the end of this section.

◄ ▲ TOC ►

Lakes, Summary of Public Input

◄ TOC ►

Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Lakes Timber Supply Area is summarized under the following headings:

- Timber Supply Analysis
- Socio-Economic Analysis
- Discussion Paper

Public input on other ongoing government processes or other issues that may influence the timber supply in the Lakes Timber Supply Area in the future is summarized at the end of this section.

◄ ▲ TOC ►

Lakes, Summary of Public Input

Timber Supply Analysis

Lakes, Summary of Public Input

◄ TOC ►

Technical critique

The technical critique states the base case is an overly conservative estimate of the available timber supply because it does not reflect current forest management practices or the best available information. The critique concludes that the allowable annual cut can be increased without jeopardizing future opportunities or the environment.

The following specific points are raised in the technical critique.

- **Environmentally sensitive areas (ESAs)**

The critique contends that ESA categories 1 and 2 should have been defined separately, as reductions for 2 should be less than for 1. It adds that reductions for recreation are unnecessary since the inventory is current for landscape and recreation features. It also notes that reductions for soils are excessive compared with other areas. The critique concludes that an additional 20 000 hectares should be retained in the land base after the reductions for ESAs.

- **Problem forest types**

The critique states that licensees have historically harvested from stands that have been excluded from the timber harvesting land base. It notes that including these stands would effectively increase the timber harvesting land base.

The critique recommends the development of new definitions for PFTs that account for improvements in milling and harvesting pulpwood and marginal timber. These improvements have enabled licensees to harvest timber in many stand types previously classified as problem forest types:

1. overmature balsam leading with less than 30 per cent spruce or pine
2. mature height class 2 pine stands, and
3. pine/deciduous stands that have acceptable coniferous volumes

The technical critique further states the Forest Service should have assessed each deciduous stand for its harvesting potential, instead of excluding all deciduous-leading stands.

- **Reductions for roads**

The technical critique contends that road reductions are overestimated for two reasons. One, stands younger than 80 years without a logging history may have been mistakenly deducted. Two, an adjustment to the land base was not made to reflect an increase in productive land resulting from road rehabilitation.

- **Woodlots**

The critique notes the *Timber Supply Analysis* results exclude the land base of existing woodlot licences (6700 hectares). The licensees contend that this land base should have been included since woodlot volumes are apportioned out of the allowable annual cut.

- **Tweedsmuir Entiako Caribou Migration Corridor and Winter Range**

The technical critique contends the area associated with the caribou must be included in the allowable annual cut determination, since a Cabinet decision on exclusion has not been made.

- **Old growth**

The technical critique recommends the difference in maturity age by species be considered in the assessment of old growth in pine-dominated forests.

Old-growth requirements should have no impact on the timber supply for the Lakes TSA. In addition, by accounting for old growth from outside the timber harvesting land base, additional area will be available for harvest from within the timber harvesting land base.

- **Forest Practices Code**

The technical critique asserts there will be no further impacts from the implementation of the Forest Practices Code, since many of the inputs to analysis have already included these considerations, through the *Interim Timber Harvesting Guidelines for the Interior Portion of the Prince Rupert Forest Region*.

- **Visual quality objectives (VQOs)**

The technical critique maintains that VQOs significantly reduce access to timber in the retention and partial retention management zones. It asserts these stands will grow into a state of extreme susceptibility to mountain pine beetle infestation and general stand decadence. By allowing harvesting activity to occur at modestly increased rates in these zones, the potential loss of currently valuable timber to insects could be avoided. In addition, by allowing the overmature pine stands within the VQO zones to be converted to young stands, the short- and long-term harvest could support an increase while still respecting the long-term health of the forest.

- **Non-net forest contribution to forest cover**

The technical critique states the non-net areas (productive forest areas excluded from the timber harvesting land base) may meet the requirements for forest cover constraints related to a given zone. It adds this is especially true for habitat requirements related to old-growth retention and thermal cover. As well, the critique contends about 144 400 hectares of productive forest are not part of the timber harvesting land base in non-VQO zones. A component of this area will be available for non-timber requirements such as biodiversity, riparian areas and migration corridors.

- **Site productivity in overmature stands**

The technical critique states site index estimates do not provide a realistic estimate of site productivity. In addition, the range of the site index equations is unreliable at older extremes. The critique contends long-term (and possibly mid-term) productivity will increase when corrected site productivity is included in timber supply analysis.

- **Site index in managed pine plantations**

The technical critique asserts that productivity in managed lodgepole pine stands has been underestimated. Results from the paired-plot study, based on a considerable amount of research data gathered and evaluated by the Ministry of Forests Research Branch, should be included as a component of the base case. The critique notes the *Timber Supply Analysis* indicates a short-term increase of at least 18 per cent is possible when the analysis includes the correction factors for managed pine stands. In addition, the analysis projects an increase in the annual harvest if the minimum rotation age is reduced.

- **Green-up height**

The technical critique asserts the 6.5-metre requirement for green-up height in visually sensitive areas is 30 per cent greater than the 5.0-metre limit used in other timber supply areas. It adds that green-up ages are likely to be reduced in response to the correction factors for managed lodgepole pine stand productivity.

- **Non-recoverable losses**

The technical critique accepts the estimates of losses as reasonable, but states that limiting access to mature and overmature pine stands (especially in visual management areas) will increase the likelihood of future losses to pine beetles and fire.

- **Silviculture treatments**

The technical critique notes that one licensee has a commercial thinning cutting permit in place with harvest scheduled for 1996. It notes this treatment is consistent with the statement made by the Minister of Forests in his letter to the chief forester regarding commercial thinning as an appropriate means of improving economic conditions. In addition, it notes that stocking control is maintained as part of all silviculture plans. This will ensure that historical productivity losses in pine stands due to over-stocking will be replaced by productivity improvements, as indicated in the paired-plot study.

- **Timber utilization**

The critique states licensees have demonstrated they practice better utilization than the required standards. Stump heights on average are below 30 centimetres, and undersized material and pulpwood are currently being utilized. This has an upward effect on short- and long-term timber supply.

Lakes, Summary of Public Input

◄ TOC ►

Other Public Input

Comments from other respondents cover a wide spectrum of concerns, from suggesting the timber supply analysis is very optimistic, to expressing surprise and pleasure that the allowable annual cut is to remain much the same for a while.

The comments have been summarized into the following categories:

- **Forest inventory**

One respondent expresses concern that outdated and inaccurate forest inventory data was used in the Forest Service analysis.

- **Growth and yield**

One respondent asserts that the paired-plot study, which compared plantation growth rates of lodgepole pine to those of natural stands, appears to have a vague scientific base. A second respondent, in contrast, supports the results of the study, and states he is doing research that shows similar results for spruce. However, he is concerned that the initial results only extend to 25 years.

- **Timber harvesting land base**

One respondent notes the potential exists to increase the timber harvesting land base. He points out that in older logged blocks, the roads and landings are coming back into production with no significant losses in productivity. He further contends that the land base deductions for low site class and height class 2 (10.5–19.4 metres) stands are too great.

- **Non-timber inventory information**

One respondent maintains the information for recreation and tourism values is inaccurate and out-dated. She adds that the caribou winter range is larger than described in the analysis reports.

Another submission states that the review disregards other life forms and the importance of maintaining water quality. A third respondent notes that it is difficult to verify information used in the analysis and is concerned that there are many uncertainties associated with it.

◄ ▲ TOC ►

Lakes, Summary of Public Input

◄ TOC ►

Socio-Economic Analysis

- **Employment and community impacts**

The technical critique concludes that raising the initial harvest level would not jeopardize the transition to the long-term level. It maintains that, with improved performance in managed pine stands, the average volume per hectare would be even higher than indicated in the base case.

The critique adds that an allowable annual cut increase in the short term would offset potential losses to beetles, disease and fire, and provide economic growth and community stability within the Lakes TSA. Employment would subsequently increase proportionally.

One respondent states there was not enough emphasis on the future employment needs of the local population.

A second respondent contends the socio-economic analysis should include an assessment of employment level differences using alternative harvesting techniques. He advocates the use of horses, small skidders and commercial thinning machines, which he says can maintain the viability of rural communities by increasing the amount of timber harvested, especially as the need for labour decreases due to mill efficiency. He further states that this employment increase would alleviate population pressures in southern B.C., and this stable and growing workforce would provide meaningful healthy outdoor employment for rural communities, alleviate family problems, reduce government financial assistance, and help local businesses and services.

In addition, this respondent maintains that utilizing shelterwood systems would eliminate feller-bunchers and grapple skidders, which have reduced employment in the Lakes Forest District.

- **Economic impacts**

One respondent states that the structure of the Lakes Forest District is perfectly suited for a growing tourism industry to replace forestry jobs. She contends a decline in natural resources impacts back-country tourism, and is concerned that the timber supply review focuses only on the economics of timber values.

She adds that future forests will not be natural; they will be plantations with regeneration uncertainties and susceptibility to disease.

- **Environmental impacts**

One respondent advocates the use of shelterwood systems. The elimination of clearcuts would lead to habitat maintenance for species dependent on extensive forest cover (grizzly bear, pileated woodpecker, hawk, woodland caribou), improvement to water quality for sport and commercial fisheries, and increased tourism values.

Another respondent states that much logging has already occurred and that, judging from a satellite image, the land does not look as if it can sustain much more.

TOC

Lakes, Summary of Public Input

◄ TOC ►

Discussion Paper

Several issues raised in the *Discussion Paper* prompted public input.

- **Allowable annual cut adjustment**

Three submissions express concern about the allowable annual cut. One recommends reducing the cut significantly in order to diversify the local economy and reduce impacts on wildlife, biodiversity, climate, water quality and quality of life. A second submission states the recommended harvest levels cannot be maintained as outlined in the timber supply review. The third respondent contends the allowable annual cut can be increased (as a result of the paired-plot study) to help mitigate timber volumes lost to habitat preservation, native land claims and aesthetics.

◄ ▲ TOC ►

Lakes, Summary of Public Input

◄ TOC ►

Related issues and processes

Comments on other issues and ongoing government processes in the Lakes Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Timber supply review process**

One submission recommends referring the process to the Land and Resource Management Planning table.

- **Tenure system**

One respondent is concerned that the tenure system is unfair. He suggests all sales should be open to everyone, regardless of size.

- **Forest management practices**

One respondent advocates clearcutting, selective logging, thinning, brushing, and weeding wherever appropriate. He wants to see as many high-value trees as possible, and every hectare of land planted with as much logging as possible. He would further like to see selective logging in parks.

Another respondent states there is a desire among the provincial population for more selective logging. He advocates using a shelterwood system, especially one utilizing horses.

A third respondent notes the *Discussion Paper* states that timber harvesting plans for the migration corridor have recently been deferred until the Lakes Land and Resource Management Plan is completed. However, Fraser Lake Sawmills is advertising the viewing of proposed silviculture prescriptions in that area. She adds that biodiversity and wildlife are not being protected by allowing harvesting adjacent to previously harvested areas when the regenerated forests are three metres tall.

◄ ▲ TOC ►

Lakes, Summary of Public Input

Appendix 1

Lakes, Summary of Public Input

◄ TOC

Submissions received by the Lakes Forest District

Forest industry
Lakes TSA Licensee Interest Group ("technical critique" prepared by Timberline Forest Inventory Consultants):
Babine Forest Products Co.
Decker Lake Forest Products
Fraser Lake Sawmills Limited
L & M Lumber Limited
Northwood Pulp and Timber Limited

Interest Groups
Lakes District Friends of the Environment

Individuals
4 submissions

◄ ▲ TOC